

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

SUZANNE JONES

Plaintiff,

v.

**H. NEIL MATKIN, in his personal and
official capacity; TONI JENKINS, in her
personal and official capacity; and
COLLIN COLLEGE**

Defendants.

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Civil Action No. 4:21-CV-733-ALM

DEPOSITION BY WRITTEN QUESTIONS

DEFINITIONS: For purposes of responding to the following questions, the definitions below apply:

- a. "Suzanne Jones" refers to Dr. Suzanne Elizabeth Jones (DOB 09-16-1971) with a home address in Plano, Texas.
- b. "Teaching Position(s)" refers to any and all faculty positions (tenure-track, non-tenure track, instructor, lecturer, clinical, and/or adjunct) in General Education programs, Developmental Education programs, Bachelor of Science in Education programs, Secondary and All-Level Teacher Certification programs, Teacher Education/Curriculum & Instruction programs, Integrated Reading/Writing courses, and/or College Success courses. By way of example only, faculty positions teaching such coursework as EDUC 1100, EDUC 1200, EDUC 1300, EDUC 1301, INRW 0315, or COSU 0330.

1. Please state your full name, occupation, and official title with the College/University. Are you authorized to answer these written questions on behalf of the College/University?

2. List all on-line Teaching Positions the College/University had open and accepted applications for from January 28, 2021 until the present. As part of your response, for each Teaching Position listed please also provide (1) how the position was posted (e.g., website, social media, newspaper, etc.); (2) whether the position was full time or part time; (3) the qualifications for the position; and (4) the position's salary and other benefits.

3. Of the open Teaching Positions you listed in response to Question No. 2 above, did the College/University receive an application for any position from Dr. Suzanne Jones? If so, (1) when, and (2) for which position(s)?

4. List all face-to-face or in-person Teaching Positions the College/University had open and accepted applications for from January 28, 2021 until the present. As part of your response, for each Teaching Position listed please also provide (1) how the position was posted (e.g., website, social media, newspaper, etc.); (2) whether the position was full time or part time; and (3) the position's salary and other benefits.

5. Of the open Teaching Positions you listed in response to Question No. 4 above, did the College/University receive an application for any position from Dr. Suzanne Jones? If so, (1) when, and (2) for which position(s)?

6. If the College/University received any employment application from Dr. Suzanne Jones, please state whether there was any follow up between the College/University and Dr. Jones. If there was a follow up, please provide the substance of that follow up, including (1) whether

there was any interview (either remote or in-person), (2) the results of that interview, and (3) whether Dr. Jones was offered employment by the College/University and, if not, why not.

7. If the College/University has offered employment to Dr. Suzanne Jones, then please state (1) the position offered, (2) the salary and benefits of the position offered, (3) whether the position was full time or part time, (4) the date the position was offered to Dr. Jones, and (5) whether Dr. Jones accepted the offer and, if not, why not.

8. As part of the deposition subpoena served on the College/University, has the College/University been served with a subpoena for the production of documents relating to Dr. Suzanne Jones?

9. Has the College/University located any documents that are responsive to the subpoena for production of documents?

10. If the College/University has located documents responsive to the subpoena for production of documents, then please hand the originals or exact duplicates of these documents to the court reporter taking your deposition for photocopying and attachment to this deposition. Have you now given all responsive documents to the court reporter? If not, identify the records and documents the College/University did not produce and explain why the College/University did not produce them.

11. Were the documents that the College/University produced and provided to the court reporter (1) made at or near the time, or from information transmitted by, someone with knowledge, (2) kept in the course of the regularly conducted activity of the College/University, and (3) making the documents were a regular practice of that activity? If the answer to any of these questions is "no" as to any document, please explain why the answer is "no."

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DOCUMENTS TO BE PRODUCED

1. Produce copies of all employment applications the College/University has received from Dr. Suzanne Jones since January 2021.
2. Produce copies of all written communications between the College/University and Dr. Suzanne Jones since January 2021.
3. Produce copies of all interview notes and/or scoresheets regarding any employment interview Dr. Suzanne Jones has had with the College/University since January 2021.